

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

MOTION TO FILE INSTANTER

Plaintiffs respectfully move to file instanter their response to Defendants' motion for protective order regarding the deposition of Ahmed Qurei (dkt. # 528). In support of their motion, Plaintiffs state as follows:

1. On September 9, 2010 Defendants filed a motion for protective order (dkt. # 528) concerning the deposition of Ahmed Qurei which Plaintiffs had previously noticed. The deadline for Plaintiffs' response was September 27, 2010.
2. A significant portion of Defendants' memorandum in support of their motion involves issues pertaining to a prior deposition of Mr. Qurei in *Saperstein v. Palestinian Authority*.
3. Accordingly, Plaintiffs intended to support their response to the motion with a declaration from the *Saperstein* Plaintiffs' counsel Norman Steiner. Due to a

death in his family on September 26, 2010, Mr. Steiner was unable to finalize his declaration by September 27, 2010.

4. On September 27, 2010, with the consent of Defendants, Plaintiffs sought a one day enlargement to file their opposition memorandum on September 28, 2010.
5. Even with this additional time, Mr. Steiner has not been available to complete his declaration.
6. Accordingly, in order to avoid further delay, Plaintiffs are now filing their response pleading without Mr. Steiner's declaration.
7. Plaintiffs therefore move to file instanter their opposition memorandum.

WHEREFORE, the instant motion should be granted.

Dated: September 29, 2010

Plaintiffs
by their Attorneys,

/s/ David J. Strachman
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CERTIFICATION

I hereby certify that on September 29, 2010 I filed this motion via ECF which served the following counsel of record:

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